

UNITED STATES DISTRICT COURT
FORT THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

No. 5:14-CR-133-H

UNITED STATES OF AMERICA)	
)	
v.)	CONSENT MOTION TO
)	CONTINUE JUNE 9, 2015
)	SENTENCING HEARING
JEFFREY ARTHUR COOK)	

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, with the consent of counsel for the Defendant, respectfully moves the Court to continue the June 9, 2015, sentencing hearing in the above-captioned matter. In support of this motion, the United States shows unto the Court as follows:

1. On October 6, 2014, Defendant Jeffrey Arthur Cook waived indictment and entered a guilty plea to a one-count criminal information charging him with Conspiracy to Commit Offenses Against the United States, in violation of 18 U.S.C. Section 371.

2. A motion hearing and status conference has been scheduled for June 4, 2015 for co-conspirator William Chamberlain. Chamberlain's arraignment will be reset following this hearing. Pursuant to his plea agreement, Defendant Cook will be called by the Government as witnesses in Chamberlain's trial.

3. The United States submits that in order for the Court to have a full picture of the Defendant's cooperation, a continuation of their sentencing hearing is necessary.

4. This Motion is made in good faith, and not for purpose of delay. Rather, it is to ensure that Defendant Cook has the ability under the plea agreement to cooperate and to have that cooperation considered at sentencing.

5. Counsel for the Defendant, Raymond C. Tarlton, knows of and consents to this motion.

WHEREFORE, the United States respectfully requests that the Court continue the sentencing hearing in this matter until the Court's September 2015 term of Court. A proposed order is attached.

Respectfully submitted this 26th day of May, 2015.

THOMAS G. WALKER
United States Attorney

/s/ Susan B. Menzer
SUSAN B. MENZER
Assistant United States Attorney
Criminal Division
310 New Bern Avenue, Suite 800
Raleigh, NC 27601-1461
Telephone: (919) 856-4099

CERTIFICATE OF SERVICE

I hereby certify that I have on this 26th day of May, 2015, served a copy of the foregoing upon the counsel for the defendant in this action by either first-class mail, postage pre-paid, or by electronically filing the foregoing with the Clerk of Court, using the CM/ECF system which will send notification of such filing to:

Raymond C. Tarlton
Tarlton Law, PLLC
333 Fayetteville St., Suite 1513
Raleigh, NC 27601

/s/ Susan B. Menzer
SUSAN B. MENZER
Assistant United States Attorney
Criminal Division
310 New Bern Avenue, Suite 800
Raleigh, NC 27601-1461
Telephone: (919) 856-4099